

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

ROCHELLE POUGET,

Plaintiff,

v.

KYSA CRUSCO, PHILIP CROSS, SALEM
FIVE BANK, HARMON LAW OFFICES,
TIMOTHY LOVELESS, JAMES R. BRACE,
PATRICIA MURPHY, JOHN COUGHLIN,
DCYF, TOWN OF NEW BOSTON, *and*
20 LINCOLN DRIVE, LLC

Defendants,

Civil Action No. 1:22-CV-00382-SM

20 LINCOLN DRIVE, LLC’S MOTION TO DISMISS

NOW COMES the Defendant, 20 Lincoln Drive, LLC (“20 Lincoln”), by and through counsel, Bernstein, Shur, Sawyer & Nelson, P.A., and hereby files a Motion to Dismiss for the reasons set forth in the contemporaneously filed Memorandum of Law in Support of 20 Lincoln Drive, LLC’s Motion to Dismiss.

PRAYERS FOR RELIEF

WHEREFORE, 20 Lincoln respectfully requests that this Honorable Court:

- A. Dismiss the Plaintiff’s Complaint with prejudice as it pertains to 20 Lincoln; and
- B. Grant such further relief as may be just and proper.

Respectfully submitted,
20 Lincoln Drive, LLC

By and through its counsel,
Bernstein, Shur, Sawyer & Nelson, P.A.

Dated: May 23, 2023

/s/ Roy W. Tilsley, Jr.
Roy W. Tilsley, Jr., Esq., NH Bar No. 9400
Hilary Holmes Rheame, Esq., NH Bar No. 265510

670 N. Commercial St., Suite 108
P.O. Box 1120
Manchester, New Hampshire 03105
T: (603) 623-8700
F: (603) 623-7775
rtilsley@bernsteinshur.com
hrheaume@bernsteinshur.com

CERTIFICATE OF SERVICE

I hereby certify that this motion was electronically filed in the court's electronic filing system and served on the following persons on this 23rd day of May, 2023 via First Class Mail:

/s/ Roy W. Tilsley, Jr.

Roy W. Tilsley, Jr., Esq.